

BellSouth Batch Options vs. AT&T Recommendation*

(*AT&T recommendation from pages 32-36 of direct testimony Mark Van de Water)

AT&T Recommendation	Ainsworth/Pate	McElroy
Include IDLC	Yes	Yes
Include UNE-L line splitting	No	??
CLEC to CLEC	Yes Few details on process.	??
Operate in conjunction with acquisition process (UNE-P)	No-embedded base only	No-embedded base only
24 hour scheduling with no overtime costs	Includes Saturday and after hours (costs?)	??
CLEC specific batches	Yes	?
Window of time specific batches—all cuts to be started and completed within window	4 hour window for coordinated Same day for end-users “account” Unclear on same day for all (See*** below.)	No. Orders will be completed in negotiated period not expected to exceed 60 or 180 days.
Sufficiently scalable to meet mass market demands	No	No
Process available on an ongoing basis	No	No
Real time electronic notification of status including order completion, e.g. Verizon’s WPTS with AT&T proposed enhancements	Web based communications system “Similar” to Verizon & SBC but for non-coordinated only. Not enough information to assess. Web based scheduling tool similar to Verizon. (Not enough information to assess) (See*** below)	??
CLECs should not have to prescreen for batch eligibility	??	??
UNE-P rate until converted	Yes	UNE-L rate when service order created
ILEC should electronically notify when batch is ready	??	No

for scheduling		
Sufficient lead time to notify customers, etc--4 days from LSR submission	No/Reduced provisioning interval from 14 to 8 days	No/no customer specific due dates provided
Ability to make changes to orders with batch due date assigned	??	No
Equivalent OSS functionality to UNE-P --Pre-Order/Order --Flowthrough --One LSR --Directory Listings	No (See***below)	BellSouth issues orders/no change from today.
Self executing process to immediately switch customers back if a cut fails (regardless of fault)	Unknown--simply refers to timely restoral/does not appear to support port in error. (See***below)	??
Low Cost	No. 10% discount	No. 15% to 25% discount.
Testing using collocation and sustained significant volume of ILEC customers	Inadequate testing	No testing
No negative impacts on processes and databases (part of test)	Not addressed	Not addressed
Trunking issues	Not addressed	Not addressed
Availability of copper/UDLC	Not addressed	Not addressed
CFA Inventories	Not addressed	Not addressed
Collocation issues	Not addressed	Not addressed
Exceptions to acquisition period	Not addressed	Not addressed
Double migration mitigation	Not addressed	Not addressed
Metrics	Not addressed	Not addressed
Meaningful SEEM	Not addressed	Not addressed
	Include DS0 EELs	

*****AT&T's Proposed Batch Hot Cut Process
Descriptive Information**

Includes all service configurations available for mass market customers, including

CLEC to CLEC
IDLC
Line-split service

The starting point for the batch is UNE-P (If CLECs are found not to be impaired in any market, UNE-P should be used as an acquisition tool)

ILEC will provide an electronic scheduling tool that advises, in increments of one hour, batch availability, e.g. 8-9 a.m. March 01, 2004-available.

Batches are CLEC specific. A batch should include a minimum of 20 lines per hour. Batches should be scheduled when NPAC is available for porting numbers. As the ILEC has no stated maximum volume, there are no other restrictions on batches within or among central offices.

To minimize the manual coordination between the ILEC and CLEC and improve response times, the batch process should include a new **system** to provide real-time electronic notification of the following work activities:

- CLEC to notify ILEC of batch, including requested due date obtained from scheduler, central office, CO and # of lines to be migrated.
- ILEC to confirm due date and provide batch ID within 1 day of receipt.
- ILEC will provide dial tone and ANI results. To facilitate CLEC tracking, these results will be provided in the order that the service orders will be worked.
- ILEC will provide jeopardies, e.g. facilities
- CLEC will indicate readiness for actual migration to occur 24 hours before due date and time (or no exception message is default concurrence).
- Frame technicians will input completion information as each cut is complete.
- CLEC will provide loop acceptance to ILEC

LSRs will be submitted by CLEC as they are today, with the addition of a batch ID code, and these orders should flow-through.

If an individual cut in a batch fails, and the number has not been ported, the ILEC should restore the service in one hour. For numbers that have been ported, the interval for restoring the customer's service should not exceed 4 hours.

If the batch process as ultimately recommended by PSC staff and approved by PSC does not have adequate measures, the FPSC should convene an industry workshop for the purpose of establishing measures.

Upon implementation of the measures, a third party test to determine if process can achieve performance standards.

AT&T recommends using ILEC retail customers in the test, using collocation equipment installed to operate as a pseudo-CLEC specifically for this test.

- 3RD party vendor designed and monitored
- PSC oversight
- sustained daily volumes for 2 weeks
- using new performance standards

--Performance measures and testing should be successfully completed before CLECs are required the use the batch process.

REQUEST: Referring to the Rebuttal Testimony of Milton McElroy, at pages 10 and 11, for each day and each central office where "test" cut-overs are described, please provide:

- (a) The date(s) pre-wiring was conducted for the cuts and how much of the pre-wiring was conducted on each date;
- (b) The number of technicians involved in the pre-wiring;
- (c) The number of technicians involved in the hot cuts; and
- (d) The number of technicians working in the central offices working simultaneously with the technicians performing the "test" pre-wiring and cuts.

RESPONSE: (a) Day 1 of Testing on December 2, 2003—West Hollywood Central Office
(total of 125 Hot Cuts)
11/28—50%, 11/29—50%

Day 2 of Testing on December 4, 2003—Arch Creek Central Office (total of 125 Hot Cuts)
11/24—25%, 11/25—25%, 11/26—25%, 11/27—25%

Day 3 of Testing on December 5, 2003—Perrine Central Office (total of 125 Hot Cuts)
12/1—12%, 12/2—24%, 12/3—24%, 12/4—40%

Day 4 of Testing on December 11, 2003—West Hollywood, Arch Creek and Perrine Central Offices (total of 383 Hot Cuts)
West Hollywood: 12/3—50%, 12/4—30%, 12/5—20%
Arch Creek: 12/4—33%, 12/5—33%, 12/8—33%
Perrine: 12/7—15%, 12/8—30%, 12/9—30%, 12/10—25%



BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7550
Fax 770-492-8412

September 20, 2002

Ms. Denise Berger
AT&T
Room 12266
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your letter of August 30, 2002, regarding AT&T's request that BellSouth adopt a new process for coordinated conversions (hot cuts) of unbundled loop service.

At the outset, your letter makes statements about the quality of BellSouth's current hot cut process performance that do not accurately reflect the level of service BellSouth provides to AT&T. BellSouth has consistently performed AT&T's hot cuts well within the established benchmark, usually 100% within 15 minutes of AT&T's requested start time. BellSouth strongly disagrees with the characterization of its current hot cut methods as "unreliable." I have attached a copy of AT&T's Local Services' Performance trend chart for On Time Installation for Hot Cuts, January through June 2002, which AT&T presented in the last monthly Executive meeting. This chart indicates that AT&T is receiving excellent service from BellSouth on its Unbundled Network Element (UNE) Loop Hot Cut conversions. Furthermore, let me remind you that the hot cut process in your Interconnection Agreement was negotiated by you personally for numerous months. BellSouth is implementing that process not only correctly, but also at extremely high service levels.

Regarding AT&T's request that BellSouth implement a bulk conversion process to migrate AT&T's end users served by Unbundled Network Element-Platform (UNE-P) to UNE Loop, as we have discussed, BellSouth is implementing a bulk conversion process as a result of AT&T's Change Request CR0215. The final user requirements were reviewed with the CLEC community on July 9, 2002. During our conversation, however, you indicated that the new process resulting from CR0215 would not meet the needs of the internal AT&T organization. Those needs apparently have prompted the request for a different new process as outlined in your August 30 letter.

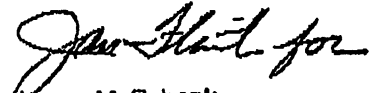
BellSouth believes that the conversion process currently in place, as a result of CR0215, will be a reliable, economical method to migrate "commercial volumes" of UNE-P customers to UNE Loops and will be mechanized for further convenience by year-end. Nevertheless, AT&T has the option of submitting another CR for the development of a second bulk hot cut process.

Possibly, a more fitting avenue for AT&T's request is BellSouth's New Business Request (NBR). If AT&T needs bulk conversions without individual Local Service Requests (LSR), after normal business hours, with project management and real-time coordination, as well as personnel available after hours to assist AT&T in resolving Connecting Facility Assignment (CFA) discrepancies and immediate service restoration when necessary, the NBR process will allow BellSouth to develop the necessary procedures and establish the market-based rates for the additional resources this proposal would require. Contrary to

AT&T's assertions that the process described will be less costly to BellSouth and, therefore, should result in lower rates for UNE Loops, it will instead add significantly to BellSouth's cost to serve. Those costs, appropriately, will be passed on to AT&T as the recipient of these services.

If we need to further discuss BellSouth's position on AT&T's request, I can be reached at 205 321-4700.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Schenk for".

James M. Schenk

Attachment

Copy to: Greg Terry

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 030851-TP

In the Matter of

IMPLEMENTATION OF REQUIREMENTS
ARISING FROM FEDERAL COMMUNICATIONS
COMMISSION'S TRIENNIAL UNE REVIEW:
LOCAL CIRCUIT SWITCHING FOR MASS
MARKET CUSTOMERS.

/

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TELEPHONIC

DEPOSITION OF: KENNETH L. AINSWORTH

TAKEN AT THE
INSTANCE OF:

The Staff of the Florida
Public Service Commission

PLACE:

Gerald L. Gunter Building
Room 309
2540 Shumard Oak Boulevard
Tallahassee, Florida

TIME:

Commenced at 2:15 p.m.
Concluded at 7:35 p.m.

DATE:

Monday, February 9, 2004

REPORTED BY:

JANE FAUROT, RPR
Chief, Office of Hearing Reporter Services
FPSC Division of Commission Clerk and
Administrative Services
(850) 413-6732

1 Q Which is less than what is happening today with hot
2 cuts?

3 A Which is less than what is happening in actuality
4 today based on the loops that are being provisioned.

5 Q Okay. For the force model that you used to project
6 LCSC and CWINs staffing, what level of manual handling on
7 orders did you assume?

8 A It is built into the -- it is built into the formula.
9 It actually counts -- it actually counts into the formulas. I
10 think, for the UNE -- let me look.

11 We used a -- we used a flow-through rate for that
12 calculation and built it in. There is a lot of -- in the
13 formulas we are using, once we put the inventory numbers in,
14 went through the process, we are looking at a flow-through
15 percentage of about, for UNE loops, about 37 percent.

16 Q So you assumed that 37 percent of the orders would
17 flow through?

18 A Yes, we did.

19 Q Okay.

20 A And then there are some other calculations in there,
21 too, and I don't want to leave you thinking that is the only
22 calculation. But that is one calculation where we built in
23 those assumptions. So we are taking into consideration the
24 flow-through rates, and what we are getting down to is the
25 count of manual LSRs that would be handled in the LCSC, based

1 on our historical documentation.

2 Q So were there any other flow-through rate assumptions
3 other than that 37 percent one?

4 A Not for the UNE, no, that was the one
5 across-the-board that we are looking at on the flow-through
6 model.

7 Q Do you have a different flow-through assumption for
8 UNE loops than you have for UNE loops with LNP?

9 A I'm not looking at -- let me see. I am only looking
10 at the UNE projections, Tami.

11 Q Okay. So is that with or without local number
12 portability?

13 A No, that is the loops with the local number
14 portability.

15 Q Okay. And that was the 37 percent number?

16 A Yes, it was.

17 Q Okay. The enhanced batch process that you discussed
18 in your surrebuttal --

19 A Right.

20 Q -- when did BellSouth decide to enhance their
21 process?

22 A You are asking me for a specific date, Tami?

23 Q Well, generally.

24 A I really can't give you a specific date. We assessed
25 every one of the workshops that we went to. We put together a

BST Line Sharing/Line Splitting Collaborative
Conference Call Notes – December 11, 2003

ATTENDEES: Via Bridge

BellSouth	Al-Call	Sunshine State Tel	Covad	AT&T	MCI	Webshoppe	Network Telephone
Debbie Timmons	Greg Davis	Andrea Loncaric	John Boshier	Jay Bradbury	Amanda Hill	Craig Uptagrafft	Kyle Kopytchak
Tommy Williams	Theresa Hall		Brian Foor	Becky Webber	Sam Tenerelli		
Diann Hammond	Melissa Davis						
Jimmy Patrick							
Vivian Smith							

FROM: Debbie Timmons, Project Manager – BellSouth Telecommunications, Inc.

NOTES:

1. Welcome and Opening Remarks

Debbie Timmons opened the meeting with roll call and agenda review.

2. Review Process Flow: Facility Reservation Pair Change

Debbie Timmons lead the review of the process flow for FRN Management Process. BellSouth has proposed and the Collaborative has accepted a process change whereby when a CLEC reserves a spare loop pair, should that loop prove not viable in the field, the I&M tech will work with AFIG & SAC to identify a viable loop pair, perform the cut & work the Shared Loop service order.

The FRN Management Process Flow will be presented for baseline at the next Collaborative meeting. Refer to the attached FRN Management Process document.

3. Loop Characteristics for Shared Loops

The update to the Proposed Standards and Procedures for Line Sharing/Splitting Loop Parameters submitted November 3rd by Greg Davis of Al-Call was reviewed. Greg Davis accepted the additional language provided by Gary Tennyson of Bellsouth and stated overall agreement with and acceptance of the document as presented.

John Boshier of Covad commented the document does not establish anything, especially since the ULM process language was removed and Covad continues to experience situations where certain Bridged Tap is detrimental to Covad's shared loop service. Debbie Timmons and Tommy Williams reviewed the history of this subject, specifically citing the need to have a specification for shared loops in the TR73600 document, that shared loop products make use of the stand-alone offering Loop Modification, and that the shared loop collaborative is not the appropriate forum to discuss the Loop Modification product as CLECs not represented in this forum use the Loop Modification process, too

Kyle Kopytchak of Network Telephone stated disagreement with the position that the Shared Loop Collaborative is not the proper forum to discuss Loop Modification, citing discussions with Jerry Latham, product manager for Loop Modification, wherein it was stated that this collaborative is the appropriate forum. Tommy Williams noted the previous collaborative discussions where Loop Modification discussions were dropped from this collaborative. Refer to meeting minutes of 10/23/03, 10/30/03 and 11/13/03.

John Boshier of Covad stated changes to the Loop Modification product are underway and asked if the changes would apply to Shared Loops. Diann Hammond of BellSouth noted that Loop Modification is a stand-alone product that CLECs may choose to use in conjunction with not only Shared Loop products, but other UNE Loop products as well. Tommy Williams of BellSouth noted that any changes to the Loop Modification product would be announced via the Carrier Notification Process and that the Interconnection Standard is the vehicle that CLECs and BellSouth use to determine how we conduct business.

Kyle Kopytchak of Network Tel and John Boshier of Covad do not accept the Proposed Standards and Procedures for Line Sharing/Splitting Loop Parameters as presented. Greg Davis of Al-Call noted that one reason the Loop Modification information was removed from the proposed standards was because

This document is for a CLEC line sharing collaborative and does not necessarily
represent the official position of any participant of the collaborative
1/25/04 10:11 AM

KPSC Case No. 2003-00379
Surrebuttal Testimony of Mark Van de Water
Exhibit: MDV-SR5
April 13, 2004

BST Line Sharing/Line Splitting Collaborative
Conference Call Notes – December 11, 2003

the Shared Loop CLEC representatives could not reach agreement on Bridged Tap. CLECs agreed to review the revisions to the Loop Modification, particularly relative to bridged tap removal before they can agree to the Loop Characteristics for Shared Loops.

Refer to the attached Proposed Standards and Procedures for Line Sharing/Splitting Loop Parameters document

4. Status on Bantam Test Jacks on BST Splitters

Tommy Williams of BellSouth introduced discussion of eliminating the Bantam Test Jacks on BellSouth Splitters, noting that it has been BellSouth's desire to do so for some time as it is costly and most CLECs don't use it. He further commented that Al-Call does use the Bantam Test Jack, but that they had not used the MLT test capability of DLEC-TAFI. When this topic was last discussed, Greg Davis of Al-Call had agreed to assess the use of the MLT capability for Al-Call's environment. Greg reported that the MLT testing does not provide them with the same capability as the Bantam Test Jack, but on the other hand, he has no objection to removing it from the offering.

A vote was called on removing the Bantam Test Jack from the BST Splitter:

Yes – Greg Davis of Al-Call

Yes – John Boshier of Covad

Yes – Sam Tenerelli of MCI

Yes – Becky Webber of AT&T

Yes – Melissa Davis of Al-Call

Yes – Craig Uptagrafft of WebShopper

Yes – Tommy Williams of BellSouth

Tommy Williams thanked the CLECs for their support and noted that the change would become part of the 2004 Shared Loop Work Plan.

5. Sharing to Splitting UNEL Discussion

During the previous Collaborative meeting, it was suggested that the Collaborative review the Line Splitting Scenario Matrix, suggesting that it may serve as a starting point to define the migration scenarios being sought by the CLECs. Debbie Timmons of BellSouth lead a review of the existing matrix. Tommy Williams of BellSouth stated it would be beneficial to know what scenarios are needed and the order of importance. (Readily identified as high importance were a) migrating existing UNE-P with line splitting to UNEL and retain DSL,) and b) migrating line sharing to UNEL with CLEC port and retain DSL.

It was suggested to update the Line Splitting Scenario Matrix with columns to identify the voice port provider as ILEC or CLEC. Craig Uptagrafft also requested that Remote Site migrations be included. The updated matrix will be reviewed and the next Collaborative meeting.

Sam Tenerelli of MCI introduced discussion of the migration process for Batch Hot Cut to Line Splitting recently ordered by California where the voice port is provided by the CLEC known as Loop Splitting in BellSouth. He also noted the CLECs need an originating process to order new service to establish DSL on a UNE Loop with CLEC voice port, and asked if BellSouth has any plans to develop, and if this was the proper forum for discussion. Tommy Williams of BellSouth affirmed this as the proper forum and advised the CLECs of his recent escalation seeking to understand if the TRO requires the ILEC to make the cross-connect to the second collocation space, whether new or hot cut.

Sam also introduced discussion of when two CLECs combine within the same collocation site, how loop tagging and spectrum management would be addressed. These discussions will be included on the next agenda.

Refer to the attached Line Splitting Scenario Matrix

BST Line Sharing/Line Splitting Collaborative
Conference Call Notes – December 11, 2003

6. 2004 Meeting Schedule

Debbie Timmons of BellSouth lead the discussion of the proposed 2004 meeting schedule. BellSouth is recommending the meeting move to one standing meeting day per month, while holding a second day in reserve to be used on an as needed basis. The collaborative agreed to hold the two meetings in January and to decide the matter of one or two meetings on a monthly basis.

Refer to the attached 2004 Meeting Schedule

7. New Business/New Agenda Items/Wrap-up

Tommy Williams requested 2004 Charter for the next agenda.

Brian Foor of Covad introduced new issues pertaining to Line Splitting provisioning and repairs. For provisioning, three items were noted: a) No response from LCSC and having to escalate too often, b) Due Dates being assigned incorrectly – getting due dates 1-5 days beyond the requested date, and c) the circuit ID is the telephone number. The issue with repair is that Covad is receiving push back from the Central Office and CWINS; there is a lack of knowledge of the process. This item will be monitored and status taken at the next the meeting.

☐ **Agenda Items:**

- Review FRN Process Flows
- Loop Characteristics of Shared Loop
- Line Sharing to Line Splitting UNEL Discussion
- 2004 Charter
- Status Covad's Issues on Line Splitting Provisioning & Maintenance

☐ **Attached Items:**

1. FRN Management Process Flow
2. Proposed Standards and Procedures for Line Sharing/Splitting Loop Parameters document
3. Line Splitting Scenario Matrix
4. 2004 Meeting Schedule

Collaborative Website:

http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/

☐ **Next Meetings: Bridge: 205-968-9300 Access: 643487 Password: 6714**

Shared Loop Collaborative Conference Call – 1/15/2004, 1:30 EST

Shared Loop Collaborative Conference Call – 1/29/2004, 12:30 EST

Norris, Sharon E - LGCRP

From: Berger, Denise C - NKLAM
Sent: Wednesday, July 30, 2003 2:11 PM
To: Brewer, Lynne
Cc: Schenk, James M; Butler, Amanda (BST); Tousek, Albert; Hyche, Keith
Subject: RE: Loop Splitting Issues

July 30, 2003

L. Brewer
BellSouth Interconnection Services

Lynne:

I understand from Keith Hyche's message below that you are leading BellSouth's efforts to develop and deploy BellSouth's loop splitting offer. This was subsequent from the issue being removed from discussions at the BellSouth/CLEC DSL Collaborative.

I would still like to understand BellSouth's positions on the following questions:

1. How does BellSouth plan to solicit and incorporate CLEC input into the development of this capability and the subsequent offering? In which CLEC forum will this be discussed?
2. What is the timeframe for delivery of this service?
3. How does BellSouth plan to provide procedures and business rules for ordering and provisioning?
4. How does BellSouth plan to provide CLECs with information around cost/price?
5. Does BellSouth plan to provide a mechanized ordering option for CLECs? Will this interface require systems upgrades or systems work by CLECs? When does BellSouth plan to provide such information?
6. Will there be a manual ordering option for CLECs?
7. Will CLECs be able to order this functionality via a single LSR?
8. Will BellSouth require CLECs to install any special or additional collocation equipment?
9. If special equipment is required, will BellSouth offer the access to such equipment as an unbundled network element?

Finally, I'd like to make sure that I am aligned with BellSouth in understanding to which FCC mandate this offer responds.

Thank you for the information. If you would like to discuss further, please call me at the number below.

Denise C. Berger
Operations Assistant Vice President
AT&T Local Services
Telephone: 404/810-8644
Facsimile: 281/664-3648
E-Mail: deberger@att.com

-----Original Message-----

From: Hyche, Keith [<mailto:Keith.Hyche@BellSouth.com>]
Sent: Tuesday, July 29, 2003 3:41 PM
To: Berger, Denise C, CSLSM
Cc: Schenk, James M; Hyche, Keith; Butler, Amanda (BST); Tousek, Albert; Brewer, Lynne
Subject: RE: Loop Splitting Issues

Denise,

The following issue has been referred to the Collocation Development Team lead by Lynne Brewer not the Collocation User Group. I apologize for the misunderstanding. This will be mentioned Thursday, July 31st during the collaborative call lead by Al Tousek.

If you have questions about the development of this product you can contact Lynne Brewer at 404-927-7536.

Thank you!

Keith Hyché

-----Original Message-----

From: Berger, Denise C, CSLSM [mailto:deberger@att.com]
Sent: Friday, July 25, 2003 2:08 PM
To: BST-Amanda Butler (E-mail)
Cc: BST-Jim Schenk (E-mail); BST-Keith Hyché (E-mail)
Subject: Loop Splitting Issues

July 25, 2003

A. Butler
BellSouth Interconnection Services

Amanda:

I spoke with Keith regarding this issue on Tuesday afternoon. However, I'm bringing it to your attention to assist Keith in obtaining a clear and quick understanding of BellSouth's intent relative to working loop splitting issues.

Included in the May 22, 2003, DSL collaborative meeting minutes is the following:

"1. Connecting Two Collocations Update

Lynne Brewer joined the call to discuss the latest developments regarding the connecting of two collocations. Lynne reported that BellSouth has initiated the development of a tariffed product whereby BellSouth will provide a service to the CLECs to connect two collocations located in the same CO through cross connects at the frame. The rate elements are presently under study. At this time no decisions have been made regarding what recurring and/or non-recurring charges may be applicable. The target availability date is Q403."

Further the meeting minutes from the June 26, 2003, collaborative state,

* Collocation to Collocation CFA

This item will no longer be tracked in the shared loop team. This collaborative took the issue to the collocation development team, which is the responsible organization. The item is now being handled by the collocation development team and outside the control of the shared loop management team. It was suggested that those interested in following this item should join the collocation users group.

Although this is not meant to reflect harshly on Keith, but I was very confused after my discussion with him. Apparently, although the shared loop (or DSL collaborative) team believes that they have handed off the issue to the Collocation Users' group, your team is not aware of the hand-off. Somehow it fell in a black hole. Additionally, since the next Collocation Users' group meeting is not scheduled until October 14, 2003, I'm perplexed at how CLECs can participate in the development of this capability. I have numerous questions regarding BellSouth's plans.

- * How does BellSouth plan to solicit and incorporate CLEC input into the development of this capability and the subsequent offering?
- * How does BellSouth plan to provide procedures and business rules for ordering and provisioning?
- * How does BellSouth plan to provide CLECs with information around cost/price?
- * Does BellSouth plan to provide a mechanized ordering option for CLECs? Will this interface require systems upgrades or systems work by CLECs? When does BellSouth plan to provide such information?
- * Will there be a manual ordering option for CLECs?
- * Will CLECs be able to order this functionality via a single LSR?
- * Will BellSouth require CLECs to install any special or additional collocation equipment?

Additionally, Keith indicated in our conversation on Tuesday that BellSouth was working to provide this capability in response to an FCC mandate. Can you share which FCC mandate that BellSouth is addressing?

Please let me know if you have additional questions.

Denise C. Berger
Operations Assistant Vice President
AT&T Local Services
Telephone: 404/810-8644
Facsimile: 281/664-3648
E-Mail: deberger@att.com

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FAX COVER

3 Pages (Including Cover)

DATE: January 16, 2004

TO: Ms. Denise Berger
Operations Assistant Vice President
AT&T Local Services
Phone No.: (770) 621-9136
Fax No.: (281) 664-3648

FROM: Lynne G. Brewer
Sr. Product Manager – Collocation
BellSouth Telecommunications, Inc.
Phone No.: (404) 927-7536
Fax No.: (404) 529-7074

RE: Letter re: Availability of Collo Cross-Connects

Comments: Denise,

As you requested, attached is a copy of the original letter I sent to you in regard to the availability of cross-connects between AT&T's collocation space and the collocation space of another carrier in the same central office. As I indicated in my email earlier this week, the original letter was mailed to you on December 19, 2003, but it was returned by the post office as being "undeliverable as addressed." In addition to this faxed copy, I will send you the original letter at the new address you included in your email. Again, I apologize for any inconvenience this may have caused you. Please contact me if you have any questions.

Thank you.

Lynne Brewer



BellSouth Interconnection Services
875 West Peachtree Street
Atlanta, Georgia 30375

December 19, 2003

Ms. Denise C Berger
Operations Assistant Vice President
AT&T Local Services
1200 Peachtree Street, NE
Atlanta, GA 30309

Dear Ms. Berger:

This is in response to your e-mail dated July 30, 2003, concerning what you referred to as BellSouth's loop splitting offer. Based on discussions in several BellSouth/CLEC DSL Collaborative meetings subsequent to your e-mail, BellSouth understands that the issue is the availability of cross-connects between AT&T's collocation space and the collocation space of another carrier. Although this issue was originally brought to the BellSouth/CLEC DSL Collaborative, it is a product development issue that has been addressed by the BellSouth Collocation Product Team.

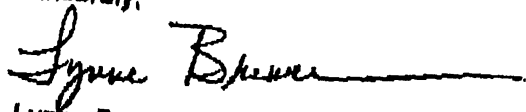
As you may already be aware, BellSouth currently allows two collocated CLECs to place co-carrier cross connects between their collocation arrangements located in the same Central Office. This offering has been available for some time and utilizes CLEC-provisioned cable placed by the CLEC's BellSouth Certified Supplier via BellSouth's cable racking assembly, if the two arrangements are not contiguous. This co-carrier cross connect offering is made available by BellSouth pursuant to the applicable language that must be included in the ordering CLEC's Interconnection Agreement. This language must also be included in the Interconnection Agreement of the other CLEC to which the co-carrier cross connect is being placed. In addition, a Letter of Authorization (LOA) is required from the other CLEC.

A similar offering called a Direct Connect is also available. This offering permits a CLEC with multiple collocation arrangements in the same Central Office to interconnect those arrangements with each other, again utilizing CLEC-provisioned cable and BellSouth's cable racking assembly.

In addition, AT&T may request a co-carrier cross connect interstate service pursuant to Section 201 of the Communications Act. Although the FCC has yet to establish a deadline for BellSouth to offer this service pursuant to tariff, BellSouth will make this service available through its Tariff FCC No. 1 in early January 2004. In this tariff filing, BellSouth will use the name "Intra-Office Cross Connects" to distinguish this interstate service from the offering available under its Interconnection Agreements described above. This will be a service provisioned by BellSouth using CLEC-provided Connecting Facility Assignment (CFA) appearances on BellSouth's frames or panels. A complete description of the service, including the rates, terms and conditions, will be included in the tariff.

I believe the questions listed in your original e-mail will be answered in the tariff filing described above, but if not, please call me at 404-927-7536 or Lue Elder at 404-927-7558.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynne Brewer", followed by a long horizontal flourish.

Lynne Brewer
Sr. Product Manager – Collocation
ICS - Marketing